

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

THE GIVING BACK FUND, INC.

Plaintiff

v.

MARK STEVERSON, RUDOLPH & BEER,
LLP., LAURENCE H. RUDOLPH and
CORINA BIGGAR

Defendants

CIVIL ACTION NO. 02-CV-104446 RWZ

DECLARATION OF MARK STEVERSON

1. I am a named as a defendant in this action. I am a practicing attorney and member of the Bar of the State of California. I am also associated with the law firm, Rudolph & Beer, LLP (the "Firm"), which has its principal place of business in New York, New York and is another named defendant in this action. As is shown in the accompanying Declaration of Laurence H. Rudolph, the Firm does not do business in Massachusetts.

2. I am a resident of the State of New York.

3. My contacts with Massachusetts have been sporadic and personal. I have never practiced law or conducted business in the Commonwealth. I do not represent any clients located in Massachusetts. At the request of the plaintiff, in approximately March of 2000, I agreed to allow my name to be added to its Board of Directors in what I understood to be essentially a ceremonial role which did not involve any responsibilities or compensation. I received no compensation from The Giving Back Fund and was not acting as an agent of the

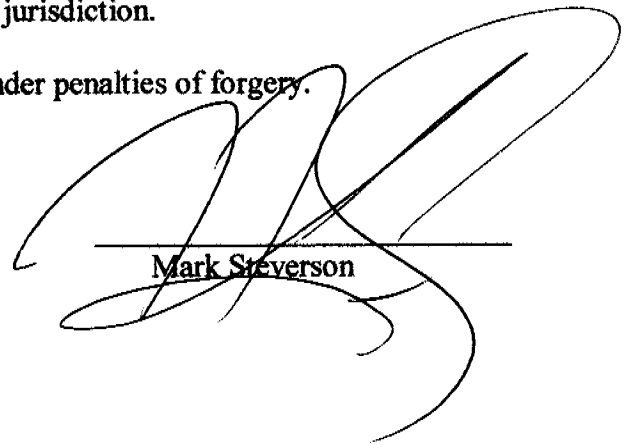
DOCKETED

①

Firm. I understand from the Complaint that I was removed from the Board in January 2002. I was not asked to perform (and did not perform) any services as a Director, I was not asked to attend (and did not attend) any Directors' meetings, and I have never been asked to transact (and did not transact) any business as a Director. I recall that on one occasion in March 2001 I traveled to Boston and met with Marc Pollick of the plaintiff.

WHEREFORE, it is respectfully requested that the Court enter an order dismissing Plaintiff's Complaint against me for lack of personal jurisdiction.

I hereby set forth that the foregoing is true under penalties of forgery.



Mark Steverson

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

THE GIVING BACK FUND, INC.
Plaintiff

v.

MARK STEVERSON, RUDOLPH & BEER,
LLP., LAURENCE H. RUDOLPH and
CORINA BIGGAR
Defendants

CIVIL ACTION NO. 02-CV-104446 RWZ

AFFIDAVIT OF CORINA BIGGAR

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

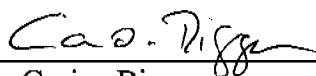
Corina Biggar, being duly sworn, deposes and says:

1. I am named as a defendant in this action. As the Complaint alleges in paragraph 5, I am a full time resident of the State of New York and I am employed in the state. I pay New York State taxes. I reside at 150 E. 37th Street, New York, New York.

2. I worked as a Foundation Director for the plaintiff from March 2000 through July 2001. On July 1, 2001, I permanently moved to New York from Massachusetts, giving up my residence there. From July 1, 2001 through July 31, 2001, I worked for the plaintiff at its New York offices located at Rudolph & Beer, LLP. On July 16, 2001, I gave notice of my resignation to plaintiff which became effective on July 31, 2001. Thereafter, on September 17, 2001, I was hired by the families of Britney Spears and Justin Timberlake to manage The Britney Spears Foundation and The Justin Timberlake Foundation. All of the allegations of the

Complaint refer to events that allegedly occurred after I moved to New York.

WHEREFORE, it is respectfully requested that the Court enter an order dismissing Plaintiff's Complaint against me for lack of personal jurisdiction.


Corina Biggar

Sworn to before me this 4th
Day of April, 2002


Notary Public

KRISTI N. GAMBLE
NOTARY PUBLIC, State of New York
No. 02GA6026435
Qualified in Kings County
Commission Expires June 14, 2003